

# Exhibit B

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**From:** Crowley, Shawn (USANYS) <Shawn.Crowley@usdoj.gov>  
**Sent:** Wednesday, June 17, 2020 1:35 PM  
**To:** Heberlig, Brian; Krouse, Michael (USANYS); Lynch, Garrett; Lake, Stephanie (USANYS); Lynch, Garrett (USANYS) [Contractor]; Kim, Jane (USANYS) 4; Bove, Emil (USANYS); Milione, Shawn (USANYS) [Contractor]; McEnany, John (USANYS)  
**Cc:** Weingarten, Reid; Bishop, Bruce; Fragale, David; Silverman, Nicholas  
**Subject:** RE: U.S. v. Sadr, Case 1:18-cr-00224-AJN

Brian,

The press releases have been removed. We will not seek or cooperate with any immigration removal proceedings against Sadr.

Thank you,

Shawn G. Crowley  
Co-Chief, Terrorism and International Narcotics Unit  
United States Attorney's Office  
Southern District of New York  
212-637-1034 (o)  
[REDACTED] (c)

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**From:** Heberlig, Brian <BHeberlig@steptoe.com>  
**Sent:** Wednesday, June 17, 2020 10:07 AM  
**To:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>; Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>; McEnany, John (USANYS) <JMcEnany@usa.doj.gov>  
**Cc:** Weingarten, Reid <RWeingarten@steptoe.com>; Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>  
**Subject:** U.S. v. Sadr, Case 1:18-cr-00224-AJN

Counsel:

The government's March 16, 2010 press release announcing the guilty verdict in this case, titled "Iranian National Convicted For Scheme to Evade U.S. Economic Sanctions By Illicitly Sending More Than \$115 Million Through the U.S. Financial System," remains on the Department of Justice's website as of this morning, June 17, 2020—after the government's June 16 filing stating that it "agrees that the Court's order of dismissal should specify that the dismissal is with prejudice," and that it does not object to the order specifying: "There was never a judgment of conviction in this case. The jury's verdict is vacated, and has no legal effect." See <https://www.justice.gov/usao-sdny/pr/iranian-national-convicted-scheme-evade->

[us-economic-sanctions-illicitly-sending-more](#). It has come to our attention that on June 12, 2020, the government added an “Update” to that press release, stating: “On June 5, 2020, the Government moved to dismiss the charges against the defendant in this case, Ali Sadr Hashemi Nejad.” After that single sentence, the press release goes on as before, detailing the charges in the indictment, the government’s view of the evidence, the guilty verdicts, and praising the work of those who investigated and prosecuted the case, including the prosecutors, the FBI, and the New York County District Attorney’s Office. While mentioning the motion to dismiss in a single sentence containing no reasons, two paragraphs later the press release continues to quote the U.S. Attorney characterizing Sadr as a felon. *Id.* This press release is the first hit returned when one searches for “Ali Sadr” on Google.

We are surprised and disappointed that the press release remains on DOJ’s website, particularly given that this does not appear to be an oversight but rather an affirmative decision to keep the full statement public with only a one-sentence “update” that does not make clear that the case is being dismissed because the government’s constitutional violations denied Sadr a fair trial. The press release continues to cause reputational damage to Sadr. We ask that you immediately take it down—before the end of the day. If you refuse to do so, please let us know by 5:00 p.m. today as it will influence how we respond to your June 16 letter.

In addition, we request the government’s agreement that you will not seek or cooperate with any immigration removal proceedings against Sadr, which we believe would be completely unwarranted given that Sadr has not been convicted of (or, in light of the impending dismissal with prejudice, even charged with) any offense. Again, if you are unwilling to give us that assurance, please let us know by 5:00 p.m. today as it will influence how we respond to your June 16 letter.

Thank you.

Brian

**Brian M. Heberlig**  
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